

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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TELECOM BUSINESS SOLUTION, LLC, *et al.*,

Petitioners,

v.

TERRA TOWERS CORP., *et al.*,

Respondents.

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X

: Civil Action No.: 1:22-cv-01761

: Judge Lewis A. Kaplan

: Magistrate Judge Robert W.  
Lehrburger

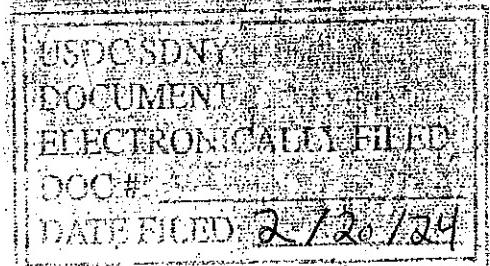
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**[PROPOSED] ORDER GRANTING PETITIONERS'  
MOTION FOR A PRELIMINARY ANTI-SUIT INJUNCTION**

This matter comes before the Court on the Motion for a Preliminary and Permanent Anti-Suit Injunction (the “Motion”) of Petitioners Telecom Business Solution, LLC and LATAM Towers, LLC (collectively, “Peppertree”) and Petitioner AMLQ Holdings (CAY) Ltd. (“AMLQ” and together with Peppertree, “Peppertree/AMLQ”). The Motion seeks a preliminary and permanent anti-suit injunction against Respondents Terra Towers Corp. and TBS Management, S.A. (collectively, “Terra”), DT Holdings, Inc. (“DTH” and together with Terra, “Respondents”), related to an action filed by Juan Francisco Quisquinay against Continental Towers LATAM Holdings Limited (the “Company”) and Jorge Gaitan in the Eastern Caribbean Supreme Court in the High Court of Justice, Commercial Division, Virgin Islands, styled *Quisquinay v. Continental Towers LATAM Holdings Limited, et al.*, Case No. BVIHCOM2023/0042 (the “BVI Action”). Upon due consideration by the Court, having considered Peppertree/AMLQ’s Motion, as well as the oppositions and/or responses, replies, or other submissions related thereto, and the evidence presented by the parties in connection therewith, the Court finds that Peppertree/AMLQ’s Motion is well-taken, and the relief requested therein is hereby GRANTED.



Accordingly, **IT IS HEREBY ORDERED** that Respondents, their officers, agents, servants, employees, attorneys, and/or all other persons who are in active concert or participation with them, acting on their behalf, and/or at their direction or within their control, including, but not limited to, Juan Francisco Quisquinay and any directors of the Company appointed by Terra:

- (1) Shall immediately withdraw, dismiss, and/or terminate the BVI Action and take all actions necessary to do so. For purposes of clarity, anything short of a full withdrawal and discontinuance—for example, a stay or partial discontinuance—<sup>would</sup> ~~will~~ constitute non-compliance with this Order; *(LAK)*
- (2) Shall refrain from promoting, facilitating, litigating, or participating in the BVI Action; and *(LAK)*
- (3) Shall refrain from bringing or instituting, or causing to be brought or instituted, promoting, facilitating, or participating in any proceeding—other than the pending arbitration, styled *Telecom Business Solution, LLC, et al. v. Terra Towers Corp., et al.*, AAA/ICDR Case No. 01-21-0000-4309—seeking to raise any legal claims or matters raised in the BVI Action, including, specifically, and without limitation, issues related to the identity of the CEO of the Company and/or whether Jorge Gaitan is the CEO of the Company. *(LAK)*

**IT IS FURTHER ORDERED THAT:**

- (4) Within ten (10) business days of the date of this Order, Respondents shall file and serve an affidavit in this action confirming that they have fully complied with this Order and detailing the method of compliance.

**SO ORDERED**

**LEWIS A. KAPLAN, USDJ**

Served at 12:04 pm  
2/20/24